

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITE HERE HEALTH, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 13 C 7849
)	
THE DESMOND 433 CORP., d/b/a)	JUDGE CHARLES R. NORGLER, SR.
DESMOND'S TAVERN,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, THE DESMOND 433 CORP., d/b/a DESMOND'S TAVERN, in the total amount of \$10,489.44, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,478.75.

On November 11, 2013, the Summons and Complaint was served on the Defendant (by tendering a copy of said documents to Silvio Smith, Managing Agent) at its place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on December 2, 2014. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Laura M. Finnegan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 18th day of April 2014:

The Desmond 433 Corp.
433 Park Avenue South
New York, NY 10016

/s/ Laura M. Finnegan

Laura M. Finnegan
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